

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

**MOTHER DOE, INDIVIDUALLY AND)
AS THE MOTHER AND NATURAL)
GUARDIAN FOR JANE DOE, A)
MINOR,)**

Plaintiff,

vs.

**RICHLAND COUNTY SCHOOL)
DISTRICT 2, SHERIFF OF)
RICHLAND COUNTY IN HIS)
OFFICIAL CAPACITY D/B/A)
RICHLAND COUNTY SHERIFF'S)
DEPARTMENT, JOHN E. EWING, &)
JAMEL BRADLEY,)**

Defendants.

C.A. No.: 3:18-cv-02731-CMC

**PLAINTIFFS' OPPOSITION TO
DEFENDANTS RICHLAND COUNTY
SHERIFF DEPARTMENT AND JOHN
EWING'S MOTION TO SEAL**

Come now the Plaintiffs, and hereby respond in opposition to Defendants Sheriff of Richland County In His Official Capacity d/b/a Richland County Sheriff's Department and John E. Ewing (hereinafter referred to as "Defendants") Motion to File Under Seal. (ECF Entry No. 131). Plaintiffs request that any confidential exhibits that could reveal the identity of the Plaintiffs, the identify of other victims of Deputy Bradley, and/or sensitive medical records be submitted in connection with these Defendants' motion for summary judgement be filed under seal. The Plaintiffs are not aware, however, of any precedent under Local Rule 5.03 for an entire motion, memorandum in support, and every exhibit in support being filed under seal, particularly in a case in which a public entity seeks dispositive relief on issues that would be explained in detail in an Order which would be available to the public at large through CM/ECF and/or published in a

federal reporter. As such, the Plaintiffs hereby object to Defendants' motion to seal the entirety of its memorandum in support of summary judgment and supporting exhibits.

Respectfully Submitted,

s/ James B. Moore III

James B. Moore III, Federal ID #10844

Scott C. Evans, Federal ID #10874

Evans Moore, LLC

121 Screven Street

Georgetown, SC 29440

Office: (843) 995-5000

Facsimile: (843) 527-4128

james@evansmoorelaw.com

scott@evansmoorelaw.com

Daniel C. Boles, Federal ID #12144

23 Broad Street

3870 Leeds Avenue | Ste. 104

Post Office Box 381

Charleston, SC 29402

Office: 843-576-5775

Facsimile: 800.878.5443

dan@boleslawfirmllc.com

Attorneys for the Plaintiff

December 5, 2019

Georgetown, South Carolina